

# **EXHIBIT 1**

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**From:** [Clayman, William G \(USAVAE\)](#)  
**To:** [Nina Ginsberg](#); [Jon Jeffress](#); ["Jade Chong-Smith"](#); [Zachary Deubler](#)  
**Cc:** [Prabhu, Jay \(USAVAE\)](#); [Schlessinger, Seth \(USAVAE\)](#)  
**Subject:** U.S. v. Sanders - Evaluation Materials  
**Date:** Friday, May 21, 2021 4:01:00 PM

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Good afternoon,

Based on Judge Ellis's instructions at the hearing today, will you please provide us all records, information, and material that Dr. Whitney reviewed or relied on in preparing the letters from him that you provided, as well as all records, information, and material that he is reviewing or relying on in preparing his evaluation report? We also ask that you provide us all test data and test materials—including any raw test scores, scoresheets, worksheets, notes, protocols, test question materials, and any result summaries and interpretative documents or reports—related to any assessments or tests administered to your client and your client's mother, as well as any notes and recordings that Dr. Whitney took or relied on while meeting with and evaluating your client and his mother. Please let us know if you won't be able to provide any of this material.

Hope you all have a nice weekend.

Bill

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